

1 Peter Goldstein [SBN 6992]
2 PETER GOLDSTEIN LAW CORP
3 peter@petergoldsteinlaw.com
4 10161 Park Run Drive, Suite 150
5 Las Vegas, Nevada 89145
6 Telephone: (702) 474-6400
7 Facsimile: (888) 400-8799

5 DEVON M. JACOB (*admitted pro hac vice*)
6 JACOB LITIGATION, INC.
7 djacob@jacoblitigation.com
8 P.O. Box 837
9 Mechanicsburg, PA 17055-0837
10 Telephone: (717) 796-7733

9 *Attorneys for Plaintiffs*
10 TROYLETTE BURTON, Individually, and as
11 administrator of the ESTATE OF THAYER
12 JOSEPH BURTON, AND THAYER BURTON

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 TROYLETTE BURTON, Individually, and as
15 Administrator of the ESTATE OF THAYER
16 JOSEPH BURTON, and THAYER BURTON,

17 Plaintiffs,

18 vs.

19 MOISES FONSECA; ROBERT SMITH;
20 JANE/JOHN DOES; ISIDRO BACA; ADAM
21 LAXALT; BARBARA CEGAVSKE; and
22 BRIAN SANDOVAL,

Defendants.

Case No. 3:20-cv-00190-MMD-CLB

**STIPULATION AND ORDER TO DISMISS
THE COMPLAINT AGAINST
DEFENDANTS, ADAM LAXALT,
BARBARA CEGAVSKE, AND BRIAN
SANDOVAL**

23 Plaintiffs, TROYLETTE BURTON, individually, and as Administrator of the ESTATE OF
24 THAYER JOSEPH BURTON, and THAYER BURTON; and Defendants, MOISES FONSECA,
25 ROBERT SMITH, JANE/JOHN DOES, ISIDRO BACA, ADAM LAXALT, BARBARA
26 CEGAVSKE, and BRIAN SANDOVAL (collectively hereinafter the “PARTIES”), by and through
27 their counsel of record, hereby stipulate and agree to the following:
28

1 Conditioned on the Court adopting the Stipulation of the Parties filed this date regarding the
2 identification of a final policymaker and defenses that are waived, Plaintiffs and Defendants stipulate
3 and agree as follows: Pursuant to FED.R.CIV.P. 41(a)(1)(A)(ii), please mark all claims against
4 DEFENDANTS, ADAM LAXALT, BARBARA CEGAVSKE, and BRIAN SANDOVAL,
5 discontinued and ended with prejudice. With respect to these Defendants only, Plaintiffs and
6 Defendants agree to bear their own fees and costs.

7

8 DATED: January 14, 2021

PETER GOLDSTEIN LAW CORP

9

10

By: /s/ Peter Goldstein

PETER GOLDSTEIN, ESQ.

Attorneys for Plaintiffs

*TROYLETTE BURTON, Individually, and as
administrator of the ESTATE OF THAYER
JOSEPH BURTON, AND THAYER BURTON*

11

12

13

DATED: January 14, 2021

14

15

By: /s/ Douglas R. Rands

AARON D. FORD, ESQ.

DOUGLAS R. RANDS, ESQ.

Attorneys for Defendants

*ISIDRO BACA, BARBARA CEGAVSKE, ADAM
LAXALT, MOISES FONSECA, BRIAN SANDOVAL and
ROBERT SMITH*

16

17

18

ORDER

19

20

21

22

23

24

25

26

27

28

IT IS SO ORDERED

DATED this 14th day of January, 2021.



UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of eighteen years and not a party to the within action; my business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

I hereby certify that on this 14th day of January, 2021, a true and correct copy of the following document **STIPULATION AND ORDER TO DISMISS THE COMPLAINT AGAINST DEFENDANTS, ADAM LAXALT, BARBARA CEGAVSKE, AND BRIAN SANDOVAL** was served by electronically filing with the Court's CM/ECF electronic filing system to the following parties:

Aaron D. Ford
Attorney General
Douglas R. Rands (SBN 3572)
Senior Deputy Attorney General
State of Nevada – Public Safety Division
100 North Carson Street
Carson City, Nevada 89701-4717
Telephone: (775) 684-1150
Email: drands@ag.nv.gov
CFondi@ag.nv.gov

*Attorneys for Defendants Isidro Baca,
Barbara Cegavske, Adam Laxalt, Brian
Sandoval and Robert Smith*

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

By: Tom Yerai
An Employee of Peter Goldstein Law Corp